

APPENDIX 2
(referred to in paragraph 2.2)

The reference

1. On 24 February 1988 the Director General of Fair Trading sent to the Commission the following reference:

The Director General of Fair Trading in exercise of his powers under sections 47(1) and (2), 49(1) and 50(1) of the Fair Trading Act 1973 (hereinafter called 'the Act'), hereby refers to the Monopolies and Mergers Commission the matter of the existence or possible existence of a monopoly situation in relation to the supply within the United Kingdom of the services of professionally regulated osteopaths in their capacity as such.

The Commission shall investigate and report on the questions whether a monopoly situation exists in relation to such supply and, if so:

- (a) by virtue of which provisions of section 7 of the Act that monopoly situation is to be taken to exist;
- (b) in favour of what person or persons that monopoly situation exists;
- (c) whether any steps (by way of uncompetitive practices or otherwise) are being taken by that person or those persons for the purpose of exploiting or maintaining the monopoly situation and, if so, by what uncompetitive practices or in what other way;
- (d) whether any action or omission on the part of that person or those persons is attributable to the existence of the monopoly situation and, if so, what action or omission and in what way it is so attributable; and
- (e) whether any facts found by the Commission in pursuance of their investigations under the preceding provisions of this paragraph operate, or may be expected to operate, against the public interest.

In this reference 'professionally regulated osteopath' means an osteopath who is subject to the rules of a body whose objects or activities include the regulation of the conduct of osteopaths in their capacity as such.

The Commission shall for the purpose of this reference limit consideration to agreements and practices relating to the advertising by professionally regulated osteopaths of their services, whereby they conduct their affairs as mentioned in section 7(2) of the Act.

The Commission shall report on this reference within a period of nine months from the date hereof.

(signed) GORDON BORRIE

24 February 1988

Director General of Fair Trading

2. On 24 February 1988 the Chairman of the Commission, acting under section 4 of the Fair Trading Act 1973 and Part II of Schedule 3 thereto, directed that the functions of the Commission in relation to the reference should be discharged through a group consisting of six members of the Commission, including himself as Chairman. The composition of the group is indicated in the list of members which prefaces this report.

3. Notices inviting evidence were placed in:

<i>The Times</i>	<i>Independent</i>
<i>Financial Times</i>	<i>Daily Mail</i>
<i>Daily Telegraph</i>	<i>Lancet</i>
<i>Guardian</i>	<i>British Medical Journal</i>

4. We received evidence from the professional bodies representing osteopaths, from other professional bodies, from a few individual osteopaths and several other sources.

5. We provisionally concluded that a complex monopoly situation existed in favour of osteopaths belonging to those professional bodies to which osteopaths belong which lay down rules for professional conduct. We subsequently informed these bodies of the provisional conclusion. All were given an outline of the points which required consideration when assessing the effect of the monopoly situation on the public interest. During the inquiry all were invited to make written representations and to attend hearings.

6. We thank all those who helped us with our inquiry, and in particular the General Council and Register of Osteopaths and the other osteopathic professional bodies.

APPENDIX 3
(referred to in paragraph 3.18)

Main elements of rules of selected professions governing advertising and publicity

<i>Signs, nameplates, stationery, etc</i>	<i>Permitted media</i>	<i>Touting/ canvassing/ supplanting</i>	<i>General content</i>	<i>Fees</i>	<i>Claims of superiority</i>	<i>Specialisms</i>	<i>Derogation from dignity of profession</i>
The Law Society Various specified restrictions	No unsolicited visits or telephone calls, with specified exceptions		Publicity to be legal, not inaccurate or misleading, in good taste and to conform with BCAP	Fee statements allowed: specified exceptions. No direct comparison with or direct criticism of fees of any other identifiable solicitor or solicitors	No comparison with or criticism of quality of service provided by any identifiable solicitor or solicitors. No reference to success rate	Publicity about particular fields of work allowed only if in fact able to handle such work. Factual claims of experience in particular fields allowed. Claims for specialization or expertise in particular fields allowed only if member of relevant Law Society panel or possesses qualification recognized by Law Society for this purpose	When obtaining or attempting to obtain instructions, must do nothing which in any manner compromises or impairs or is likely to impair the good repute of the solicitor or of his profession
The Law Society of Scotland	'In any way he thinks fit'	Touting and canvassing prohibited	No inaccuracy or misleading statements	No fee comparison with others	No claim of superiority over others in quality of practice or services		Not to be by such means or of such a character as may reasonably be regarded as bringing the profession into disrepute
The Institute of Chartered Accountants in England and Wales	Advertising in any medium permitted	No unsolicited telephone calls or visits	Regard for ASA standards	No fee comparison or quote. Free consultations over fees may be offered	No claim of superiority and no belittling	Specialisms may be advertised	Not to obtain or seek work in an unprofessional manner
General Dental Council	No unsolicited telephone calls	Touting and canvassing prohibited	Legal, decent and truthful, with regard for professional propriety. Claims must be capable of substantiation. No flamboyant grandiose or misleading descriptions of any services	Fee quote allowed	No claim of superiority	No indication of specialist expertise. Mention of particular types of treatment allowed	Not to be of such a character that could reasonably be regarded as likely to bring the profession into disrepute

<i>Signs, nameplates, stationery, etc</i>	<i>Permitted media</i>	<i>Touting/ canvassing/ supplanting</i>	<i>General content</i>	<i>Fees</i>	<i>Claims of superiority</i>	<i>Specialisms</i>	<i>Derogation from dignity of profession</i>
The Chiropodists Board To be dignified and professionally restrained in character	Written and audio visual allowed		To be headed State Registered Chiropodist. No other material to be larger or more prominently displayed than the heading. Accurate and restrained. Should not be false, fraudulent, misleading, deceptive, self-laudatory, unfair or sensational		No explicit claims for superiority in personal skills, equipment or facilities		
The British Chiropody Association		Canvassing/soliciting/ supplanting prohibited	BCAP or IBA Code	Can be quoted above a set minimum			
The Society of Chiropodists Name plates etc to be of a professional character, dignified and restrained	Not to take advantage of right to submit or comment upon copy in the press as a means of advertising. Also applies to press interviews. Size of announcements of practice regulated		BCAP, dignified and restrained in character		No deprecation of professional skill, knowledge, services or qualifications of other members for the purpose of obtaining patients or work		
General Optical Council			Claims must be capable of substantiation, legal, decent, honest and truthful		No claims of superiority and no reference to efficiency or facilities of others		Not to be of such a character that could reasonably be regarded as likely to bring the profession of ophthalmic optician or of dispensing optician into disrepute

Appendix 3 (continued)

<i>Signs, nameplates, stationery, etc</i>	<i>Permitted media</i>	<i>Touting/ canvassing/ supplanting</i>	<i>General content</i>	<i>Fees</i>	<i>Claims of superiority</i>	<i>Specialisms</i>	<i>Derogation from dignity of profession</i>
The Physiotherapists Board							
Signs should be accurate and professionally restrained	Unrestricted		Should not be false, fraudulent, misleading, deceptive, self-laudatory, unfair or sensational		No explicit claims of superiority in personal skills, equipment or facilities		
Chartered Society of Physiotherapy							
	No unsolicited personal or telephone calls	Forbidden	Accurate and professionally restrained. Not to be false, fraudulent, misleading, deceptive, self-laudatory unfair or sensational		No explicit claims of superiority		To adhere at all times to personal and professional standards which reflect credit on the profession
The Institution of Structural Engineers							
According to conditions set out in guidelines on site signboards and use of the Institution's logo	Advertisements in newspapers, journals, and directories, radio and TV allowed. Text limited to the name of the member and his firm, address and telephone number, with a brief description of the services offered. Format should be 'discreet'. Free to contribute to items in the press, radio and television to give information of help or interest to the public	Can send letters to persons or organizations who may have an interest in receiving the information	Must be factual and not misleading. 'Freedom to inform that is helpful to the public, while upholding the professional dignity of a member as an engineer'		No extravagant or self-laudatory language. Not to be unfair to other members or other professions. Must not imply that the services offered may be obtained only from that member or that they are better than those offered by others	May state qualifications of members of a firm or partnership and give description of the services available	Employed members must use their 'best endeavours' to ensure that their employers do not in any advertising or approach to clients compromise their professional standing
The Chartered Institution of Building Services Engineers							
	Any medium permitted		BCAP or IBA Code		Forbidden		Publicity not to undermine the status of the profession

<i>Signs, nameplates, stationery, etc</i>	<i>Permitted media</i>	<i>Touting/ canvassing/ supplanting</i>	<i>General content</i>	<i>Fees</i>	<i>Claims of superiority</i>	<i>Specialisms</i>	<i>Derogation from dignity of profession</i>
The Royal College of Veterinary Surgeons To be of a professional character	Radio and TV permitted, subject to general content and dignity of profession considerations	No unsolicited personal calls or mail. No invitations to Open Days to non-clients	Nothing to be included in breach of the law or omitted if the law requires its inclusion. To be honest, truthful and capable of substantiation. Not to be so worded as to abuse trust of lay public or exploit their lack of experience or knowledge of the advertiser, his services or the services of other vets. Not to be directly or indirectly aimed at children or young persons. Nothing likely in the light of generally prevailing standards of decency and propriety to cause serious or widespread offence	Not to be quoted. (Reasons related to difficulty of quoting in advance for the services.) Availability of preliminary estimate can be advertised	Forbidden. Other vets not to be disparaged	Claims to specialization forbidden. Additional qualifications can be shown. May not indicate that only one species or class of animal treated. May indicate services principally so provided on condition emergency first aid services for other animals shown	Not to contain any material or be in a form or be published or circulated in a way which would be likely to bring the profession into disrepute. Proper professional tone to be maintained

APPENDIX 4.1

(referred to in paragraphs 2.2, 2.12 and 4.1)

Detailed information concerning bodies representing osteopaths

<i>Body</i>	<i>Estimates of no. of osteopaths registered with or members of body</i>	<i>Accredited schools</i>	<i>Training</i>	<i>Letters denoting membership/ qualification</i>	<i>Other recognized schools or qualifications</i>
General Council & Register of Osteopaths	1,210 (1,140 UK)	British School of Osteopathy British College of Naturopathy & Osteopathy European School of Osteopathy (Maidstone) London College of Osteopathic Medicine	4 years full-time except LCOM	Registered Osteopath MRO	
		<i>Associated schools</i>			
Osteopathic Association of Great Britain	550	British School of Osteopathy	4 years full-time		European School of Osteopathy British College of Naturopathy & Osteopathy London College of Osteopathic Medicine
British Naturopathic and Osteopathic Association	175	British College of Naturopathy and Osteopathy	4 years full-time	MBNOA NDOMBNOA	
British Osteopathic Association	95	London College of Osteopathic Medicine Colleges of Osteopathic Medicine & Surgery (USA)	13-month course for medical practitioners at LCOM	MLCOM FLCOM	
Osteopathic & Naturopathic Guild	120	Own training centre	Along the lines of an Open University course	MGON DO ND	
London & Counties Society of Physiologists	100 offering their services as osteopaths in the UK	Northern Institute of Massage	4 years part-time	FLCSP(Phys) LCSP(Phys) LCSP(DO)	
Faculty of Osteopathy	97	Fylde School of Natural Therapies	4 years part-time	MFO DO	Membership also open to anyone who has obtained a diploma in osteopathy from any school in Britain or overseas
College of Osteopaths	116	College of Osteopaths Educational Trust Maidstone College of Osteopaths	6 years part-time	MCO	
British & European Osteopathic Association	80	Andrew Still College of Osteopathy	5 or 6 years part-time	MBEOA	
Natural Therapeutic & Osteopathic Society	70	London School of Osteopathy	5 years part-time	DO	
Guild of Osteopaths London	106	Northern Counties School of Osteopathy	4 years part-time (1 year postgraduate)	MGO(Lon) AMGO(Lon)	Accept people who have qualification from 'recognized' schools & have completed at least 5 years' full-time practice
International Guild of Natural Medicine Practitioners	50 of which 14 are osteopaths				

**Code of Ethics of the General Council and Register of
Osteopaths relating to advertising**

GENERAL

1. NO MEMBER SHALL ADVERTISE OR ALLOW HIS NAME TO BE ADVERTISED IN ANY WAY EXCEPT IN THE FORM LAID DOWN BY THE COUNCIL

Any form of commercialism in the conduct of an osteopathic practice is unseemly and undesirable. Consequently, advertising as such is expressly forbidden except in the situations listed below.

COMMENCEMENT OF PRACTICE

2. The GCRO makes an exception to the rules on advertising in the case of Registered Osteopaths setting up a new practice. These members are permitted to place a Commencement of Practice notice in their local newspapers only in the format set out below:

REGISTERED OSTEOPATH

**THE GENERAL COUNCIL AND REGISTER OF
OSTEOPATHS**

announces that

Mr/Mrs/Miss DO MRO, has commenced practice
at Telephone.....

He/She is available for consultations at the following times:

(state days and times of consultations)

The rules in the following paragraphs apply and any deviation from them will render the member liable to disciplinary action. It is the responsibility of the member to ensure that the newspaper has the correct format and instructions by putting this in writing and by obtaining confirmation from the newspaper to avoid printing errors.

3. All orders to newspapers to print permitted advertisements must be submitted through the Secretary of the GCRO for formal approval. The submission should consist of:

- (a) A covering letter to the Secretary explaining what is required and enclosing, if possible, a sample page from the relevant newspaper to show the normal style, type and format. It is left to the member's discretion as to where the advertisement is placed; it should however appear in the most appropriate section, such as public announcements.
- (b) The letter to the Editor of the newspaper concerned, placing the order and enclosing the draft of the advertisement. The letter must include, in precise wording, the following points:
 - (1) No variation in format is allowed (except that the insertion of details of the days and times of consultations is optional);
 - (2) Only the words 'REGISTERED OSTEOPATH' and 'GENERAL COUNCIL AND REGISTER OF OSTEOPATHS' may be in *heavy* type;
 - (3) The rest of the announcement must be in light type only;
 - (4) The announcement may be placed in a thin-lined box no larger than one double column wide and 4 cms deep.

(c) An unsealed stamped envelope addressed to the Editor. The Secretary will endorse the order with the GCRO's formal approval and will send it on to the newspaper in the envelope provided. No acknowledgement will be given.

4. There is no limit placed on the number of advertisements allowed during the permitted period of one year from the commencement of the practice.

5. Members joining existing practices, whether as partners or as assistants, are not permitted to place Commencement of Practice notices.

EXTENSION OF COMMENCEMENT OF PRACTICE NOTICES

6. Any member who, by virtue of the date on which he commenced practice, misses the deadline for entry into the Yellow Pages directory, so that there is a gap of three months or more between the end of his permitted Commencement of Practice notices and the publication of the next edition of Yellow Pages, may apply to the Council for an extension of his Commencement of Practice notices.

7. He must supply the Council with evidence to support the application.

UNFAIR ADVERTISING BY UNREGISTERED OSTEOPATHS

8. Any member who practises in an area where there are other osteopaths who are not members and who indulge in intensive advertising to the detriment of that member may apply to the GCRO for permission to insert, in the paper in which the advertisements are appearing, an advertisement giving information about the Register and its members. This application must be accompanied by evidence, such as a copy of the advertisement, how often it appears etc.

9. If permission is granted, the wording of such an announcement will be given by the Council together with the number of insertions allowed. The cost of these announcements will be borne by the member.

CHANGE OF ADDRESS

10. A Member who moves the address of his practice may insert the following announcement in the local press:

' REGISTERED OSTEOPATH

THE GENERAL COUNCIL AND REGISTER OF OSTEOPATHS'

announces that Mr	formerly practising
at	is now in practice
at	TEL: ,

The rules in paragraphs 3 to 5 above apply except that advertisements are permitted over a period not exceeding three months from the change of address.

ADVERTISING IN DIRECTORIES AND HANDBOOKS THE POLICY

11. The GCRO draws a distinction between the dissemination of information, in order to assist members of the public to make informed choices regarding the type of treatment available to them and to make them aware of the difference in standards which exist in osteopathy, and advertising for personal promotion which is aimed expressly at attracting patients to a particular practice for financial gain. It is aware however that there are occasions when these two opposing requirements overlap. One of them concerns entries of practitioners' names in directories and handbooks.

12. Council considers it entirely proper for members to place their details in a block entry under the GCRO's heading on payment of a charge in reputable and bona fide directories such as the Yellow Pages directories, Health Authority

handbooks, Local Authority listings and similar publications. What is, and is not, considered to be a suitable publication is a matter for the Ethics Committee to decide in each individual case. Members wishing to make use of this facility must apply through the Secretary for permission on every occasion except in the case of the Yellow Page directories where permission may be assumed to have been granted, subject to the submission by the buying authority of entry details for clearance.

13. No details of any assistant may appear in any directory without the permission of his or her principal.

GENERAL RULES

14. When permission for the inclusion of a block entry in a directory has been given the following rules apply:

- (a) The entry should be under the heading 'Registered Osteopaths' and should include the preamble set out at the end of this paragraph. The inclusion of this preamble is mandatory unless authority to dispense with it is granted.
- (b) Only the heading REGISTERED OSTEOPATHS may be in heavy type. The rest of the entry must be in light type up to a maximum of 9 pt Times Roman except as provided for in sub-paragraph (d) below.
- (c) All Registered Osteopaths who practise within the geographical circulation area of the directory must be given the opportunity of putting their names in the entry. It is up to the individual member then to decide if he or she wishes to subscribe to the scheme. Responsibility for contacting the relevant members rests with the publishers who will be supplied, on request, with a copy of the current Register of Osteopaths by the GCRO's Secretariat.
- (d) The entry may be listed either with the members' names in alphabetical order or under the towns in which they practise in alphabetical order. The town heading may be in heavy type but the rest of the entry must be in light type.
- (e) The entries are intended to draw the public eye to the GCRO and its members. They are not there to promote other therapies or to enhance the standing of members with additional qualifications. No letters may appear therefore after the member's name except 'DO, MRO' or, in the case of Registered Medical Practitioners only, 'MLCOM'. These letters must however appear.
- (f) The only details which may be printed are the members' names, addresses and telephone numbers. No other material is permitted.
- (g) The contracts are individual ones between the publishers and the Registered Osteopaths concerned.

REGISTERED OSTEOPATHS

the General Council and Register of Osteopaths, founded in 1936, is the independent body which monitors standards of clinical training and maintains strict ethical control over its members. These can be recognized by the initials 'MRO' and the title 'Registered Osteopath'.

name and address

name and address

etc

The General Council and Register of Osteopaths
21 Suffolk Street London SW1Y 4HG
Telephone: 01-839 2060

15. Exceptions to these rules for block entries in the Yellow Pages directories are set out in the following paragraphs.

VARIATIONS FOR YELLOW PAGES DIRECTORIES

16. Until such time as a commercial concern undertakes the co-ordination of all GCRO entries responsibility for the efficient insertion of entries will lie with whichever Registered Osteopath (the buying authority) volunteers to submit the block GCRO advertisement for any particular area. The contract with Yellow Pages Sales Limited will be his and he will act as agent for all members who wish their details to be included in the entry. He is entitled to charge those members a reasonable commission for the work which he does, and the expenses which he incurs, on their behalf.

17. The buying authority must contact all the Registered Osteopaths who practise within the catchment area of the directory and offer them the chance of being included in the block entry. To ensure that newcomers to the district are not omitted he should get an up-to-date list of local practitioners from the GCRO's Secretariat.

18. Before a firm order is placed with Yellow Pages Limited the buying authority must submit to the GCRO's Secretariat for approval a detailed layout of the proposed entry or, preferably, a proof of the entry itself. The entry must be prefixed with the heading and preamble set out at the end of paragraph 14.

FREE AND SINGLE LINE ENTRIES

19. Standard free entries in telephone, Yellow Pages and similar directories are permitted. The addition of decorations, academic awards and other qualifications are allowed with the limitation that the only osteopathic qualifications which may be printed are 'DO, MRO', or 'MLCOM' if appropriate. Members are entitled to pay for the addition of those qualifications, if they so wish, where only the name is printed free of charge. The use of capital letters or bold type however is not permitted.

20. On occasions permission may be granted for the straightforward listing of names, addresses and telephone numbers only, even though payment for the entry is required, in certain directories and handbooks where the inclusion of the entry is clearly giving information for the benefit of the public. Each individual request will be considered on its own merits and application should be made through the Register's Secretariat.

ENTRIES IN MORE THAN ONE DIRECTORY

21. Where the premises at which any member or partnership practises are located in an area which is covered by two or more directories, such member or partnership may arrange for details to appear in all those directories.

22. Where the premises at which any member or partnership practises are located in an area which is close to the boundary of an area or areas covered by another directory or directories, such member or partnership may arrange for details to appear in the directory for that area or areas.

23. All entries must be in light type except as provided for in paragraphs 14(b) and 14(d).

OSTEOPATHIC DIRECTORY ENTRIES

24. MEMBERS MAY APPEAR IN THE OFFICIAL DIRECTORY OF THE REGISTER ONLY. The Register has no objection to Members being simultaneously members of other osteopathic organisations. However, in order not to add to public confusion over osteopathic qualifications no Member may allow his details to appear in any directory intended for use by the public which is issued by any osteopathic organization other than the Register. The only exceptions to this rule are entries which have been approved in advance by the Council, either generally or in a particular instance.

CAUTION

25. Members are reminded that many publishers of directories are less than perfect in carrying out instructions carefully. Publishers are in the business of selling advertising space for profit and are not as concerned with accuracy as one would wish. The onus therefore is on members to make sure that their instructions are written, detailed and precise and that a careful record is kept of them. Proofs should be demanded whenever possible and written confirmation of the order should be required. When an error has been made in the printed copy the GCRO's office should be informed straightaway.

26. Members, new to an area, who have missed the copy date for the next edition of the Yellow Pages directory may care to consider asking for an extension to the time limit for the Commencement of Practice announcement in their local newspaper rather than paying expensively for the additions of qualifications in an otherwise free entry in another directory.

27. Whenever there is doubt as to the legitimacy of an entry or as to the correct procedure the Register's Secretary should be consulted by telephone on 01-839 2060.

DOOR PLATES AND SIGNS

28. It is important that the public should be informed of the location of members' practices. Plates and signs should not however be used to draw public attention to the services of one practice at the expense of another.

29. In choosing the wording and size of a plate or sign outside a practice, the following rules and criteria should be considered:

- (a) The sign or plate should be unostentatious in size and form.
- (b) It may include the name and qualifications of all osteopaths who regularly attend patients at the practice, together with the title(s) 'Registered Osteopath(s)'.
- (c) The Council will not allow a member to carry on a practice in a name other than that which appears in the Register or to display signs indicating that a member is in regular attendance at a practice when he is not. A member therefore should only retain the professional plate of a predecessor if the name has been plainly preceded by the words 'late' or 'formerly' and the plate should be removed after a reasonable time which should not exceed three years. Where an assistant has ceased to work at a practice his name should be removed from the plate or sign as soon as practicable and in any case not more than six months after his departure.
- (d) The plate or sign may include any or all of the following information: practice telephone number, telephone number for emergency treatments, hours of attendance.
- (e) If the practice is situated in a residential area it is permissible to have, in addition to the sign or plate, the words REGISTERED OSTEOPATH and the telephone number of the practice in gold or similar lettering in conformity with local professional usage on up to two windows of the practice.
- (f) If the practice is carried on at business premises in a commercial street it is permissible to have, in addition to what is permitted in a residential area, the same wording on a small sign or fasciaboard sign.

LETTER HEADINGS

30. Letter headings, receipts and other stationery used in 'private practice' may show only members' names, initials denoting qualifications, addresses and if desired 'Registered Osteopath' or other title such as 'Naturopath', 'Acupuncturist' etc provided this is accurate. No deviation from this is allowed.

31. Members are reminded that, whether or not they practice under a business name, it is a legal requirement that all partners' names must be included on all business letters, invoices, receipts and demands, and at the premises of the practice. Special rules apply to partnership of more than twenty persons. Changes in partnerships should be noted as soon as they occur.

BROADCASTS, LECTURES, ARTICLES ETC

32. Members are advised to consult the Secretary of the Register before participating in any form of publicity in the press, on television or by radio, because:

- (a) there is a risk that such participation might constitute advertising;
- (b) there may be difficulties which can be avoided only by expert advice. When asked for comment by a newspaper, especially a national newspaper, Members should realise that they will have little or no control over the published form and content of any article, nor is there any certainty that they will be quoted in full, or in the context they intend. Similar dangers exist in edited radio and television programmes;
- (c) if not properly informed on the subject matter a contributor could be responsible for the publication of incorrect information and thus be the cause of misleading information reaching the public.

33. The Council does not seek to stifle the views and opinions of individuals but does not necessarily agree that the media are the best means of airing them.

34. The Council and every Member must take all steps to ensure that publicity originating from them is seemly and proper and does not in any way damage the public image of the profession or the Register's interests.

LECTURING/TEACHING

35. Lecturing to medical and paraosteopathic groups, and the public, in order that they may better understand the work of the Registered Osteopath, the scope of his services and his overall role is perfectly acceptable. The permitted scope of such lecturing is largely a matter of common sense in interpreting the relevant provisions of the Register's Memorandum and Articles of Association. However, it should not relate to the individual osteopath nor be used to advertise his services.

36. The teaching of an individual on an 'apprentice' basis within a Member's practice is not permitted.

Any member in doubt as to any of the above matters should clarify his position in advance with the Secretary of the Register.

37. The Council considers that proper consultation with the Secretary over publicity of any sort is of paramount importance. This will not only help to avoid the pitfalls and difficulties outlined above, but it will almost certainly be of great assistance to the Member faced with publicity and make it easier to deal successfully with it.

38. Members may publish books, pamphlets and articles of an informative nature about osteopathy and other subjects relevant to it. Such books, pamphlets and articles must however be of objective scientific and educational value, and must avoid matters that might be considered to be in the nature of personal advertising.

COMMERCIALISM IN OSTEOPATHIC PRACTICES

39. With the upsurge in interest in complementary medicine and osteopathy, the profession has started to be approached by more and more companies offering a wide range of products, from beds to vitamins, some offering incentives such as bulk discounts etc to practitioners willing to help them sell their products or display the product plus advertising literature in their waiting rooms.

40. One of the reasons that the GCRO has built up a great deal of goodwill and respect amongst the medical profession and the public is that it has always sought to maintain the highest standards of behaviour amongst its members, by avoiding all forms of unacceptable commercialism.

41. In view of these recent trends, the Council considers that Members should have guidance on this subject. It is not intended that all combinations of situations should be listed, but rather to spell out in general terms what is or is not acceptable.

42. The only situation where it is considered ethical for a Member to either sell or recommend that a patient purchases an appliance or product of any nature, is where in his professional judgement, such an appliance or product will be of benefit to that patient.

43. The stocking of goods coupled with the display of those goods, together with literature which may encourage patients to purchase, for no good reason other than profit, would certainly be considered unethical.

44. Whilst it is perfectly acceptable for members to stock products such as corsets, collars, TE braces, etc, whose immediate use may be of benefit to the patient, it is considered that it is generally more professional that members should advise patients where such products as they prescribe may be purchased, rather than act as retail outlets and expose themselves to the criticism that they stood to gain financially by such advice. Members are again requested to consult the Secretary of the GCRO if they have any fears that ethical rulings are being breached.

ADVERTISING AIDS

45. It has been brought to the notice of the Council that some Members have engaged in the distribution of such articles as biros with the Member's name and address printed on them. Any behaviour of a similar nature will in future be immediately passed to the Professional Ethics Sub-Committee.

USE OF THE DESIGNATION 'CLINIC' IN OSTEOPATHIC PRACTICES AND ESTABLISHMENTS

46. Any Member of the Register who wishes to:

- (a) style his practice a clinic;
- (b) form a multi-disciplinary clinic, or health centre, etc;
- (c) be employed by or practise at the aforesaid is bound by the following rules and procedures.

47. Members who are employed by or form part of a clinic, are reminded that even though they may have no control over the other practitioners or disciplines practising there, or over the way in which the clinic is run, they will be held fully accountable for any malpractices that are carried out by that clinic, because they may, by virtue of their association with it, have put the good name of the Register and its Members at risk.

48. Although the Council has no objection to ethically and professionally run multi-disciplinary clinics, there are today, as a result of the considerable public interest in health matters and complementary medicine, a great number of clinics, health centres, etc, opening up. Some of these are associated with such things as saunas, sunbeds, etc, and are not the type of establishment with which our Members, if they wish to be taken seriously by other members of the medical profession, should wish to be associated. Indeed Members working at or running such an establishment would render themselves liable to disciplinary action.

PROCEDURE FOR MEMBERS WISHING TO APPLY TO THE COUNCIL FOR PERMISSION TO STYLE THEIR PRACTICE A CLINIC, ETC

49. The applicant must supply the Council with the following information:

- 1. the name of the proposed clinic;
- 2. the reasons for wishing to form this clinic;
- 3. full details of all practitioners involved with it, together with their qualifications and which professional bodies they belong to;
- 4. any other material in support of their application.

The Council will consider each application on its merit and on the information it has been supplied with. It also reserves the right to interview the applicant/applicants. Its decision will be final and binding.

RULES APPLYING TO MEMBERS WHO HAVE BEEN GRANTED THE COUNCIL'S PERMISSION

50. The main ethical considerations are that:

(a) NO MEMBER WHO IS ALLOWED TO STYLE HIS PRACTICE A CLINIC IS IN ANY WAY IN ADVANTAGE OVER ANOTHER MEMBER.

(b) NO FORM OF COMMERCIALISM EXISTS.

1. Any subsequent changes in name or structure of the clinic must be registered with the Council.

2. No dual entries for the clinic and the practitioners are allowed in directories. The member/members must decide whether they wish to have the name of the clinic, *or* their names and professional qualifications, in Yellow Pages or similar recognized directory. *They are not allowed both, ie*

(a) The name of the clinic, address and telephone number, *or*

(b) The practitioners' names, initials of qualification, address and telephone number.

3. No articles are to be published in local newspapers or free handouts about the clinic or the therapies practised there. The publication of any such articles will be deemed advertising, and may render the member/members liable to disciplinary action.

4. Any printed matter published by the clinic which describes the therapies practised there should be of a highly professional nature and not include anything in the nature of personal advertising. The section dealing with osteopathy should include details of the GCRO.

5. Only the normal-sized professional plate with the name of the clinic on it is allowed, conforming in every other respect to the requirements of the Code of Ethics (see paragraphs 28 and 29).

It is finally reiterated that any Member should take great care before associating with any other practitioner who does not conform to the same professional standards, or does not readily agree to abide by these ethical requirements.

APPENDIX 4.3
(referred to in paragraph 4.6)

**Code of Ethics and Articles of Association
of the Osteopathic Association of Great Britain relating
to advertising**

Code of Ethics

- (3) Members must not advertise or canvass for patients.
- (4) Any announcement regarding change of address, or of the setting up of a new practice must be in accordance with the Regulations laid down by the General Council and Register of Osteopaths Ltd.
- (5) Whereas a Member can properly play a part in informing the public on osteopathic matters of public interest by articles, books, lectures and broadcasting, he must not do so in any way which calls attention to his own professional skill or achievements.
- (6) A Member may make himself or herself known by displaying on his or her premises, a professional plate of neat design and reasonable size, displaying his or her name, and qualifications; but shall not use any designation inconsistent with the dignity of his profession as an Osteopathic Practitioner.
- (7) Members must not use the initials 'O.A.G.B' on stationery or on name-plates, in such a way as to imply 'a professional qualification'.

Articles of Association

INDIVIDUAL PUBLICITY

60. Section (1)

- (a) Except as hereinafter provided or with the prior written approval of the Council a Member shall not advertise in any newspaper or periodical or leaflet; or any other means.
- (b) The only announcement permitted either to a new graduate, or for change of address is to be in accordance with the Regulations laid down by the General Council and Register of Osteopaths Ltd., as may be from time to time determined.

Section (2)

No member shall establish, conduct or associate himself with any Osteopathic Institute, Bureau or other organization of a similar nature as a means to securing public confidence and/or personal publicity, neither shall he in any way apply to himself or to his professional activity any title or description which may be misleading.

PUBLICITY

61. All clinics approved and sponsored by the Association must be under the personal supervision of a member of the Association. An annual financial statement shall be prepared and submitted to the Council.
62. The Council may from time to time at their discretion insert notices in reputable news media, to the effect, that a Directory of Members of this Association may be had from the Secretary.

Code of Ethics of the British Naturopathic and Osteopathic Association relating to advertising

Rule one

C1. Transfer of a Patient

Action taken by a member to persuade the patient of another practitioner or of his principal (if he or she is employed as an assistant), or of a clinic in which he or she may be working, to patronize him or her is in all circumstances unethical and contravenes this Code of Ethics. In consequence it is advisable that members should apply a clear and proper procedure when exchanging or referring patients or dealing with the patients of other practitioners.

C.2. Denigration

No matter how justified a practitioner may feel in holding critical views of a colleague's competence or behaviour, it is unprofessional and would be considered unethical that he or she should communicate such an opinion to a third party. Not only might such criticisms be considered unjustified or slanderous, but it is contrary to good naturopathic or osteopathic practice that the confidence of the public should be undermined because of personally held views.

A member to whom criticisms of a colleague's competence are communicated, whether he or she be a member of the Association or not, should at all times act with discretion and should himself express no opinion. An exception to this is when a member needs to refer a complaint to the Executive Council of the Association.

Rule two

NO MEMBER MAY ADVERTISE OR ALLOW HIS OR HER NAME TO BE ADVERTISED IN ANY WAY, EXCEPT IN THE FORM LAID DOWN BY THE EXECUTIVE COUNCIL OF THE ASSOCIATION.

Any form of commercialism in the conduct of a Naturopathic or Osteopathic practice is unseemly and undesirable. Consequently, advertising as such is expressly forbidden, except in the situations listed below:

A. Commencement of Practice

Some discreet publicity for Naturopathy or Osteopathy is allowed to assist a new member starting in practice as, and the public seeking the services of, a qualified practitioner. A member may make a commencement of practice announcement in his or her local newspaper only when he or she has submitted a copy of the proposed announcement in the format laid down below, to the Secretary of the Association, and has obtained his or her written approval of the advertisement. The format will be:

THE BRITISH NATUROPATHIC AND OSTEOPATHIC ASSOCIATION
announces that Mr/Mrs/Ms..... has
commenced practice at.....
..... Tel.....

The following rules apply and any deviation from them will render the member liable to disciplinary action:

1. No variation from the format is allowed.
2. Only 'THE BRITISH NATUROPATHIC AND OSTEOPATHIC ASSOCIATION' may be in heavy type.

3. The rest of the announcement must be in light type only.
4. The announcement must be only a single column lineage advertisement and no display or semi display advertisements may be used.
5. It is the responsibility of the member to see that the newspaper has the correct format and instructions by putting this in writing and obtaining confirmation from the newspaper to avoid printing errors.
6. Twelve insertions are permitted over a period of six months from commencement of practice.
7. Where more than one newspaper is used, the permitted number of insertions must be shared between them.
8. In the case of a new group practice the same rules shall apply as for an individual practitioner, except that the name of the practice (if any) and of all its members may be included.
9. The cost of placing such announcements shall be borne by the practitioners concerned.

B. Change of Address

A member who moves the address of his or her practice may insert the following announcement in the local press:

THE BRITISH NATUROPATHIC AND OSTEOPATHIC ASSOCIATION
announces that Mr/Mrs/Ms.....
formerly practising at.....
is now in practice at
..... Tel.....

The rules in A above apply, except that six insertions are permitted over a period of three months from the change of address.

C. Opening of Additional Practice(s)

A member who opens an additional practice may insert the following announcement in the local press:

THE BRITISH NATUROPATHIC AND OSTEOPATHIC ASSOCIATION
announces that Mr/Mrs/Ms.....
in practice at
is now also practising at
..... Tel.....

The rules in A above apply, except that six insertions are permitted over a period of three months from the opening of the new practice. In the case of a member opening a new practice in an area already covered by previous announcements, two announcements only are allowed.

D. Partnership/Assistantship

One public announcement, utilizing the format in A above shall be permitted in a case where:

1. A member joins an existing practice.
2. A member takes on an assistant or becomes an assistant.

E. Yellow Pages

The guiding principle in deciding what is allowable is that between practitioners there should be nothing that distinguishes or highlights one entry from

another thereby giving unfair advantage by attracting the eye of the public to the highlighted entry. In addition the entry shall consist of no more than the practice or practitioner's name, address, telephone number and where appropriate designatory letters.

E.1 Entry in more than one Directory

1. Where the premises at which a member practises are located in an area which is covered by two or more directories, the member may arrange for details to appear in all those directories, providing the entries are in light type only.
2. Where the premises at which a member practises are located in an area which is close to the boundary of an area or areas covered by another directory or directories, the member may arrange for details to appear in the directory or directories for that area or areas provided the entries are in light type only.

E.2 Extra entries in the same Directory

1. Any member who is not the telephone subscriber, but is a member of a partnership or group practice sharing the same premises and telephone, may arrange for his or her name to appear in the same directory or directories as the partnership or group practice, providing the entries are in light type only.
2. No details of any assistant may appear in a directory without the permission of his or her principal.

E.3 Group Entries

Any member or members may appear in a 'Group Entry' set out under the heading in 2 to 4 below. Members wishing to avail themselves of said entry should contact the Secretary to the Executive Council, who will take responsibility for organizing the entry under the rules set out below:

1. All members in the area will be approached and included in the entry if they wish.
2. The entry will be headed:
'MEMBER OF THE BRITISH NATUROPATHIC AND
OSTEOPATHIC ASSOCIATION' or
'MEMBERS OF THE BRITISH NATUROPATHIC AND
OSTEOPATHIC ASSOCIATION' and only this heading may be in heavy type.
3. In the case of a single member, the rest of the entry will consist of no more than the practitioner's name, address, telephone number and designatory letters, in light type only.
4. In the case of more than one member, the entry may be listed either with the members' names in alphabetical order or under towns in which they practise in alphabetical order. The town name may be in heavy type, but the rest of the entry will be in light type.
5. The cost of placing such an entry shall be borne in equal parts by all the members participating in it.

F. British Telecom Directory Entries

The same rules apply as for Yellow Pages entries described in D above, with the exception of 'Group Entries' which are not permitted by British Telecom.

G. Other Directory Entries

The existence today of many directories issued by newspapers, commercial enterprises, town halls etc, makes it impossible to lay down rigid rules over entries therein.

In general the Association has no objection to the details of a member appearing in such Directories, even if payment is required, providing the following rules are followed:

1. Entries must be in light type.
2. Other members of the Association in the area have been invited to appear if they wish.
3. Details of members of other healing professions (eg acupuncturists, physiotherapists, etc) appear in it.
4. It is a bona fide directory, and is not for the purpose of advertising.

If there is any doubt about the suitability of an entry or of any such directory, the Executive Council of the Association should be consulted.

H. Door Plates, Signs, etc

These must not be considered a form of advertisement for the practitioner and therefore must not appear to be such. Nothing more than the normal professional plate customary in the member's area of practice is permitted.

I. Letter Headings, Business Cards etc

1. Letter headings, business cards and other stationery used in 'private practice' must be in a strictly professional style and may show only the business or company name if used, members' names, designatory letters, address, telephone number, and if desired, 'Naturopath' 'Osteopath' or other title such as 'Acupuncturists' 'Chiropractor' etc, provided this is accurate. No deviation from this is allowed.
2. Members are reminded that, whether or not they practise under a business name, it is a legal requirement that all partners' names must be included on all business stationery, and at the premises of the practice. Special rules apply to partnerships of more than twenty persons. Changes in partnership should be noted as soon as they occur.
3. Public display of letter headings, business cards etc, is strictly forbidden.

J. Therapeutic Establishments

A member shall not display his or her name in connection with any therapeutic establishment in which he or she has an interest, unless the form and style of any such announcement has been approved in advance by the Executive Council of the Association.

Members should be aware of the distinction between a 'group practice' (as mentioned in A.8 above) by which is meant a group of Naturopathic or Osteopathic practitioners working in shared premises under an individual or practice name, and a 'therapeutic establishment' by which is meant, for example, a residential clinic or multi-disciplinary practice. Members who practise in multi-disciplinary clinics are reminded that, for the purposes of advertising, these are regarded as being identical to 'group practices', and any advertising must be in accordance with the rules contained herein. Members must accept that they have a responsibility to ensure that any publicity or advertising engaged in by such a clinic, or its proprietor, is in keeping with the Aims and Objects of the Association and does not infringe this ethical Code. Members contemplating joining such a clinic should satisfy themselves that all advertising and publicity conforms to the rules contained herein. Difficulties may arise when members practise with practitioners who do not adhere to an established Code of Ethics, or where the proprietor(s) of such a clinic are not themselves bound by such a code. In such cases, members are strongly advised to consult the Executive Council of the Association before deciding how best to proceed. (See also Rule 5, Section B below.)

K. Broadcasts, Lectures, Articles etc

Members are advised to consult the Executive Council of the Association before participating in any form of publicity in the press, or on television or radio because:

1. There is a risk that such participation might constitute advertising.
2. There may be difficulties which can be avoided only by means of expert advice. When asked for comment by a newspaper, especially a national newspaper, members should realize that they have little or no control over the published form and content, nor is there any certainty that they will be quoted in full, or in the context they intend. Similar dangers exist in edited television or radio programmes.
3. If not properly informed on the subject matter, a contributor could be responsible for the publication of incorrect information and thus be the cause of misleading information reaching the public. The Executive Council and every member must take all steps to ensure that publicity originating from them is seemly and proper, and does not in any way damage the public image of the profession or the Association's interests.

L. Informational Leaflets, Literature, etc

L.1 The circulation of literature intended to educate and inform the public about the work of the naturopath or osteopath, the scope of his services etc, is perfectly acceptable. The Association's leaflets on naturopathy and osteopathy are a good example of the type of literature recommended. Such literature should not relate to the individual practitioner nor be used to advertise his or her services. The following rules apply:

1. Any reference to an individual member must be confined to his or her name, designatory letters, address and telephone number.
2. The literature offered should be of a strictly professional style and format.
3. The literature should be distributed to members of the public only at their express wish, eg leaflets may be left in the reception area of the practice or posted at the request of an interested individual. In addition, the Executive Council of the Association may authorize the distribution of informational literature at exhibitions, seminars etc, in which the Association is participating.
4. The use of such literature in promotional activities of any kind, eg mail shots, mass leafletting or public displays etc, is strictly forbidden.

L.2 Members may publish books, pamphlets and articles of an informative nature about naturopathic or osteopathic and other subjects relevant to it. Such publications must however be of scientific or educational value, and must avoid matters that might be considered to be in the nature of personal advertising.

L.3 Members shall not use their membership qualifications together with their names for the commercializing of any product or remedy, and they shall not advertise themselves as having any connection with any retail or commercial establishment.

The Executive Council considers that proper consultation over publicity of any sort is of paramount importance. This will not only help to avoid the pitfalls and difficulties outlined above, but will certainly be of great assistance to the member involved in publicity and make it easier to deal successfully with it.

Advertising and relations with the media are subjects of continuous review and discussion, not only among practitioners but all the healing professions. It is therefore not possible to outline all the situations and eventualities that may arise. A member in doubt as to any of the above matters should clarify his or her position in advance with the Executive Council of the Association.

APPENDIX 4.5
(referred to in paragraph 4.14)

**Bye Laws of the Osteopathic and Naturopathic Guild relating
to advertising**

2. Members may announce commencement of practice in a newspaper advertisement in a style approved by the Council of The Register after submission of the copy advertisement to the Secretary. Change of Address or other alteration such as times of consulting may be announced in a similar manner, eg The Osteopathic and Naturopathic Guild announce that Mr 'Smith' DO MGON is now in practice at. . . Consultations by Appointment. Tel:
3. Members may not allow their names to be associated commercially with any remedy or advertisement for any remedy. They may not advertise themselves in connection with any retail establishment or commercial concern for any purpose whatever.
6. In all cases of doubt in advertising a member shall abide by the ruling and advice received in this connection from the Secretary acting on instructions approved by The Council of The Guild.
8. No claim of any kind shall be made by a member respecting treatment and cure of specific diseases.
9. Members noteheads, advice sheets and account slips, etc, must conform in every way with Bye Laws Nos 4 and 5. No advertising other than Consulting Hours may be added to the name, address and qualifications with description such as 'Incorporated Osteopath' or 'Naturopathic Practitioner' applicable to the Member and only the Symbol may be added to this when the noteheads are ordered from the Registered Office and the official block is used.
10. Professional Name Plates shall not be larger than 12 in × 9 in and shall bear only the name, letters approved, and description of the member permitted with the Telephone number and 'Consulting Hours' or 'By Appointment Only' or both as desired.

APPENDIX 4.6
(referred to in paragraph 4.23)

**Code of Ethics of the British and European
Osteopathic Association, and the Natural Therapeutic
and Osteopathic Society relating to advertising**

- 2 (b) A member shall not advertise his professional service or any treatment by any means other than in the professional directories of an approved standard and telephone directory entries in standard type-face only.
- (c) Contributions to newspapers, periodicals, professional journals and other publishers works may appear over a member's name and bona fide qualifications, with sub-title of official status if relevant to the topic under consideration (eg 'Secretary—College of Osteopaths', when writing in this capacity).
- (d) A member may discreetly announce in newspapers and periodicals for up to five separate insertions within a period of one month his commencement in practice at a particular address or an extension to the scope of his practice.
- (e) Practice stationery should be of an acceptable standard stating only name, qualifications, appropriate professional activities, address, telephone number and practice hours as applicable.
- (f) Nameplates should not exceed 15 in × 12 in and may state only name, qualifications, appropriate professional activities and practice if applicable.
- (g) Members should not describe themselves as practising any therapy which cannot be regarded as ancillary to or complementary to the practice of osteopathy. In particular the (name of professional body) designation or description 'osteopath' should not be used together with descriptions such as Beauty Therapist, Hairdresser, Masseur, etc.
- (h) A member shall not use the prefix 'Dr' or 'Doctor' so as to give the impression of being a registered medical practitioner. A member holding a qualification such as Doctor of Osteopathy, Doctor of Chiropractic or Doctor of Science issued by an authority approved by the (name of professional body) must append the description 'Doctor of Osteopathy' etc after his name.

APPENDIX 4.7
(referred to in paragraph 4.26)

**Code of Ethics of the Guild of Osteopaths London
relating to advertising**

- 8 (a) Any Member wishing to advertise his professional services shall only contribute to professional directories or periodicals of a Natural Medicine or Charitable nature.
- (b) He may only submit his Name, Status, bona fide qualifications and memberships, name of premises (ie Health Centre—Clinic, etc) address and telephone number.
9. A Member may publish, and let it be known, if he be qualified in any other therapy other than Osteopathy (Natural Therapeutics, etc).
10. A member may request the Guild's permission to discreetly announce in newspapers and periodicals for a period of one month only, in order to make known of his commencement in practice or in the event of an extension of same.
- 11 (a) Stationery should be printed of good quality, stating name, qualifications and membership according to his professional activities, name of premises, address and telephone number, hours of business as appropriate.
- (b) A Member will officially, in writing, request the permission of the Guild before publishing the Guild's Crest on any printed matter.
12. Nameplates should not exceed 15in × 12in and may state name, qualifications, memberships, professional status, practice hours if applicable.
13. In the event of a Member being sole principal or having part ownership of a registered Clinic according to the local Government bylaws and employ further assistance during practice, it is permissible to set up the name or title of that Clinic or Centre in professional bolder type on the exterior of the premises.

APPENDIX 4.8
(referred to in paragraph 4.26)

**Code of Ethics of the International Guild of Natural
Medicine Practitioners relating to advertising**

8. The member will only contribute to professional directories or periodicals of a Natural Medicine or charitable nature should he/she wish to advertise his/her professional services.
9. The member will only submit the name, status and bona fide qualifications and may state accepted membership and may name the title of the premises, be it a Health Centre, Clinic, etc, the address and telephone number.
10. In the event of the commencement of practice within a located area or to announce the extension of same, the member may discreetly announce the fact for a period of one month only in newspapers and periodicals and is expected to request The International Guild's written permission before advertising.
11. Stationery will be printed of good quality, stating name, qualifications and membership according to the member's professional activities, name of premises (if titled), the address and telephone number and hours of business as appropriate.
12. Name Plates should not exceed 15in × 12in and may state only qualifications, membership, professional status, therapies practised and practice hours if applicable.
13. In the event of a member being sole principal or part owner of a registered clinic according to the local Government bylaws and employ additional assistance during practice, it is permissible to set up the name of that clinic or centre on a professional board or upon the structure of the premises in bolder type.

APPENDIX 7
(referred to in paragraph 7.1)

Fair Trading Act 1973: note on complex monopoly situation

1. Under the provisions of section 7(1)(c) of the Act a 'monopoly situation' exists in relation to the supply of services of any description if at least one-quarter of all the services of a particular description which are supplied in the United Kingdom are supplied by members of one and the same group consisting of two or more such persons as are mentioned in subsection 7(2) of the Act.

2. Section 7(2) provides that the two or more persons referred to in subsection 7(1)(c) in relation to services of any description, are any two or more persons (not being a group of interconnected bodies corporate) who whether voluntarily or not, and whether by agreement or not, so conduct their respective affairs as in any way to prevent, restrict or distort competition in connection with the supply of goods of that description, whether or not they themselves are affected by the competition and whether the competition is between persons by whom or for whom, services are supplied. Such a situation is described by the Act (section 11) as a 'complex monopoly situation'.

Index

- Advertising**
(see also Advertising rules)
(see also names of individual advertising bodies) definition of, 2.3
distinction between informative and persuasive advertising, 6.16, 6.17, 6.19
General Council and Register of Osteopaths' members encouraged to use GCRO's own advertisements, 5.20
persuasive advertising, views: Advertising Standards Authority, 6.16; General Council and Register of Osteopaths, 5.9, 5.11
professional responsibilities, 3.6–3.8
views: Faculty of Osteopathy, 5.40; The Osteopathic and Naturopathic Guild, 5.38
- The Advertising Association**
views on: relaxation of advertising rules, 6.18; use of British Code Of Advertising Practice for regulating professional advertising, 6.18
- Advertising by the professions: a review of the remaining significant restrictions, Office of Fair Trading, October 1988**
referred to, 2.1
- Advertising restrictions**
(see Advertising rules)
(see also names of individual bodies representing osteopaths)
British Code of Advertising Practice: breaches of, 6.13; British Naturopathic and Osteopathic Association's views on, 5.35; Osteopathic Association of Great Britain's views on, 5.30; views of various advertising bodies on its use for regulating professional advertising, 6.15, 6.18, 6.19, 6.20
changes in: summary of chapter 3, 3.1
conclusions and recommendations of the report, 7.33–7.40
disadvantages: possible ones pointed to in 1976 Monopolies and Mergers Commission reports, 3.9
effects on: competition with unregulated osteopaths, 5.22, 7.16; covert self-promotion, 5.17, 7.15; efficiency and competitive situation, 3.11, 3.12; establishment of practices, 5.13, 5.27, 5.41, 6.2, 7.11–7.13; expansion of practices, 5.14, 7.11–7.13; having names mentioned in articles, 6.2; new facilities and innovation, 5.15; practising in non-osteopathic establishments, 6.2; prices, 5.16; profession, 6.9; professional standards, 6.3–6.5; protection of patient's health, 5.3, 5.34, 7.24–7.29; public awareness, 3.10, 5.18, 6.2, 6.7, 6.8, 7.17–7.23; public awareness of prices, 5.28; public's attitude to professions, 3.13; showing areas of specialization, 5.29, 6.2; statutory recognition, 5.29; supply of professional services (1970 Monopolies and Mergers Commission report), 3.3; trust between patient and practitioner, 5.39
Monopolies and Mergers Commission reports on, in relation to supply of professional services: 1970 report, 3.2–3.4; 1976 reports, 3.5–3.15
relaxation of: by General Council and Register of Osteopaths in last five years, 5.24; by various professions, 3.16, 3.17; comparison between professions, Appendix 3, 3.18; differing views in Osteopathic Association of Great Britain, 5.27
relaxation of, effects on: establishment of practices, 5.32; prices, 3.27, 3.28; professional standards, 5.5; protection of patient's health, 5.3, 7.24–7.29; public awareness, 5.6, 5.29, 5.31, 5.37; statutory recognition, 5.29, 7.32; trust of medical profession, 5.4, 7.31, 7.32; unity and common standards, 5.7, 7.32
relaxation of, views: British Chiropody Association, 3.24; General Optical Council, 3.23; Institution of Structural Engineers, 3.26; Law Society of Scotland, 3.20–3.22; Royal College of Veterinary Surgeons, 3.25
remedies, 5.26, 5.35
summary of report, 1.1–1.5
views of osteopaths (Office of Fair Trading telephone survey): on adverse effects of advertising, 2.22; on benefits of advertising, 2.21; on favoured types of advertising media, 2.23; general, 2.19; on what rules there should be, 2.20
views of osteopaths (other survey): registered with General Council and Register of Osteopaths, 2.24
views of patients of General Council and Register of Osteopaths members: 1986 survey, 2.25; 1988 survey, 2.26, 2.27
views of ten professionally regulated osteopaths on: having names mentioned in articles, 6.2; hindrance to establishment of practices, 6.2; practising in non-osteopathic establishments, 6.2; public awareness, 6.2; showing areas of specialization, 6.2
- Advertising Standards Authority**
breaches of British Code of Advertising Practice, 6.13
claims of superiority, 6.14
distinction between informative and persuasive advertising, 6.16
function of, 6.12
views on use of British Code of Advertising Practice for regulating professional advertising, 6.15
- ASA**
(see Advertising Standards Authority)
- Association of Osteopathic Practitioners**
aims and membership of, 4.19
- BCAP**
(see British Code of Advertising Practice)
- BNOA**
(see British Naturopathic and Osteopathic Association)
- British Code of Advertising Practice**
breaches of, 6.13
views: British Naturopathic and Osteopathic Association, 5.35; Osteopathic Association of Great Britain, 5.30; various advertising bodies on its use for regulating professional advertising, 6.15, 6.18, 6.19, 6.20
- The British and European Osteopathic Association**
advertising rules: extract from Code of Ethics, Appendix 4.6; summary of, 4.23; views on, 5.41–5.43
description of, 4.21
- British Medical Association**
acceptance of osteopathic knowledge, 2.18
views on relaxation of advertising rules, 6.3–6.5
- British Naturopathic and Osteopathic Association**
accreditation by General Council and Register of Osteopaths, 4.8
advertising rules: enforcement of, 4.10; extracts from Code of Ethics, Appendix 4.4; summary of, 4.9; views on, 5.31–5.35
aims and benefits of membership, 4.7
supply of corporate information to public, 2.28, 5.33
- British Osteopathic Association**
advertising rules: summary of, 4.12; views; on relaxation of, 5.36, 5.37
exclusion from report, 1.3
membership of, 4.11
- Chiropractic**
distinction from osteopathy, 2.8
- College of Osteopaths**
advertising rules: summary of, 4.20; views on, 5.41–5.43
aims and membership of, 4.20
- Competition**
through prices, 5.16, 7.14
with unregulated osteopaths: effects of advertising rules on, 7.16
- Consumer information**
(see Publication awareness)
- Faculty of Osteopathy**
advertising rules: summary of, 4.18; views on, 5.40
aims and membership of, 4.17
- GCRO**
(see General Council and Register of Osteopaths)
- General Council and Register of Osteopaths**
advertising rules: consolidated version of Code of Ethics, Appendix 4.2; enforcement of, 4.4; members attitudes towards surveyed, 2.24; patients of registered osteopaths surveyed, 2.25–2.27; relaxation of in last five years, 5.24; summary of, 4.3; views on relaxation of, 5.2–5.8, 5.26
attempts at securing professional status, 2.14
benefits of membership, 4.2
supply of corporate information to public, 2.28, 5.10, 5.20
views on: active dissemination of information by individual osteopaths, 5.21
- General Medical Council**
medical practitioners allowed to refer patients to osteopaths, 2.18

- The Guild of Natural Medicine Practitioners
(see The International Guild of Natural Medicine Practitioners)
- Guild of Osteopaths, London
advertising rules: extract from Code of Ethics, Appendix 4.7;
summary of, 4.26; views on 5.44
aims and membership of, 4.24
- IBA
(see Independent Broadcasting Authority)
- The Incorporated Society of British Advertisers Ltd
views on: relaxation of advertising rules, 6.20; use of British Code of
Advertising Practice for regulating professional advertising, 6.20
- Independent Broadcasting Authority
distinction between informative and persuasive advertising, 6.17
- Information available to public
(see Public awareness)
- The Institute for Complementary Medicine
views on public awareness, 6.6
- The Institute of Practitioners in Advertising
distinction between informative and persuasive advertising, 6.19
views on: relaxation of advertising rules, 6.19; use of British Code Of
Advertising Practice for regulating professional advertising, 6.19
- The International Guild of Natural Medicine Practitioners
advertising rules: extract from Code of Ethics, Appendix 4.8;
summary of, 4.26
membership of, 4.25
- LCSP
(see London and Counties Society of Physiologists)
- London and Counties Society of Physiologists
advertising rules: summary of, 4.16; views on, 5.39
aims and membership of, 4.15
- The Maidstone College of Osteopathy
views on: advertising rules, 6.9; public awareness, 6.8
- Monopolies and Mergers Commission
background to reference, 2.1
conclusions and recommendations of the report, 7.33–7.40
considerations of effects of advertising rules on: competition with
unregulated osteopaths, 7.16; covert self-promotion, 7.15;
establishment of practices, 7.11–7.13; price competition, 7.14;
professional status, 7.30–7.32; protection of patient's health, 7.24–
7.29; public awareness, 7.17–7.23
interpretation of terms of reference, 2.2
summary of report, 1.1–1.5
terms of reference, Appendix 2
- Monopolies and Mergers Commission reports
1970 report on certain restrictive practices in relation to supply of
professional services, 3.2–3.4
1976 reports on advertising restrictions on services of certain
professions: conclusions and recommendations, 3.14, 3.15
1976 reports on advertising restrictions on services of: accountants,
3.5–3.14; advocates, 3.5, 3.15; barristers, 3.5, 3.15; solicitors in
England and Wales, 3.5–3.14; solicitors in Scotland, 3.5–3.14;
stockbrokers, 3.5–3.14; veterinary surgeons, 3.5–3.14
- Monopoly situation
complex monopoly situation, Appendix 7
existence, 5.12, 7.1–7.6
- National Health Service
osteopathy outside framework of, 2.16
- The Natural Therapeutic and Osteopathic Society
advertising rules: extracts from Code of Ethics, Appendix 4.6;
summary of, 4.23; views on 5.41–5.43
description of, 4.22
- Naturopathy
distinction from osteopathy, 2.10
- Osteopathic Association of Great Britain
advertising rules: extracts from articles of Association and Code of
Ethics, Appendix 4.3; summary of, 4.6; views on, 5.27–5.30
aims and benefits of membership, 4.5
- The Osteopathic and Naturopathic Guild
advertising rules: full text of Guild's Bye-Laws, Appendix 4.5;
summary of, 4.14
membership of, 4.13
views on advertising, 5.38
- Osteopaths
(see Osteopathy)
- Osteopathy
(see Advertising rules)
- absence of recognized specialisms, 5.19
definition of: diagnosis, 2.5; 'professionally regulated osteopath',
2.2; science, 2.5; treatment, 2.5
differences in approaches of osteopaths, 2.6
distinction from: chiropractic, 2.8; naturopathy, 2.10; physiotherapy,
2.9
historical background, 2.4
majority of patients with lower back or neck pains, 2.7
need for increased public awareness through corporate information,
5.10
numbers of osteopaths, 2.17
osteopaths: choice of by patients, 2.28
osteopaths' views on advertising rules: Office of Fair Trading
telephone survey, 2.19–2.23, other survey on General Council and
Register of Osteopaths members, 2.24
outside National Health Service, 2.16
relationship with medical profession: decline in hostility from
traditional medicine, 2.18
special factors according to General Council and Register of
Osteopaths, 5.2–5.11
training and qualifications: courses on offer, 2.12, Appendix 4.1; no
universally recognized standards, 2.11
- Patients
choice of osteopaths, 2.28
corporate information supplied by osteopathic bodies, 2.28
protection of health by advertising rules: according to General
Council and Register of Osteopaths, 5.3; conclusions of the report,
7.24–7.29
views on advertising by osteopaths, 1988 survey, 2.26, 2.27; 1986
survey, 2.25
- Persuasive advertising
views: Advertising Standards Authority, 6.16; General Council and
Register of Osteopaths, 5.9, 5.11
- Physiotherapy
distinction from osteopathy, 2.9
- Prices
considerations of the report, 7.14
effects of: advertising rules on, 5.16, 5.28; advertising rules on public
awareness of, 5.28; relaxation of advertising rules on, 3.27, 3.28
- Professional bodies
(see also names of individual bodies)
background, 1.2
detailed information on bodies representing osteopaths, Appendix
4.1
general arguments of certain professions against advertising, 3.8
recent proposals for statutory registration, 2.15
supply of corporate information to public, 2.28
views on relaxation of advertising rules: British Chiropractic
Association, 3.24; General Optical Council, 3.23; Institution of
Structural Engineers, 3.26; Law Society of Scotland, 3.20–3.22;
Royal College of Veterinary Surgeons, 3.25
- Professional qualifications
(see Training and qualifications)
- Professional status and standards
acceptance of osteopathic knowledge by British Medical Association,
2.18
contribution by advertising rules, 5.24
decline in hostility from medical profession, 2.18
effects of relaxation of advertising rules on, views: British Medical
Association, 6.3–6.5; considerations of the report, 7.30–7.32;
General Council and Register of Osteopaths, 5.5, 5.7
growth in trust of doctors according to General Council and Register
of Osteopaths, 5.4
securing recognition of: historical, 2.13; recent proposals for
statutory registration, 2.15; role of General Council and Register of
Osteopaths, 2.14

(References are to paragraph numbers, not page numbers)

Public awareness

- absence of statutory recognition, 5.6
- considerations and conclusions of the report, 7.17–7.23, 7.34, 7.35
- effects of: advertising rules on, 5.6, 5.28, 6.2, 7.17–7.23; relaxation of advertising rules on, 5.29, 5.31
- need to be increased through corporate information, 5.10
- supply of corporate information by: British Naturopathic and Osteopathic Association, 5.33; General Council and Register of Osteopaths, 2.28, 5.10, 5.20
- views: The Institute for Complementary Medicine; Society of Manipulative Osteopaths Ltd, 6.7

Public interest

- conclusions and recommendations of the report, 7.34–7.40
- considerations of the report, 7.7–7.10
- views: British Medical Association, 6.3–6.5; General Council and Register of Osteopaths, 5.23

Qualifications

(see Training and qualifications)

SMO

(see Society of Manipulative Osteopaths Ltd)

Society of Manipulative Osteopaths Ltd

- views on public awareness, 6.7

Training and qualifications

- Andrew Still College of Osteopathy and Natural Therapeutics: established by The British and European Osteopathic Association, 4.21
- British College of Naturopathy and Osteopathy: accreditation by General Council and Register of Osteopaths, 4.8
- The College of Osteopaths, 4.20

Training and qualifications—*contd*

- courses on offer, 2.12, Appendix 4.1
- current assessment of some schools by The British Accreditation Council for Independent Further and Higher Education, 2.15
- Fylde School of Natural Therapies: association with Faculty of Osteopathy, 4.17
- London College of Osteopathic Medicine: association with British Osteopathic Association, 4.11
- London School of Osteopathy: association with The Natural Therapeutic and Osteopathic Society, 4.22
- no universally recognized standards, 2.11
- Northern Institute of Massage: association with London and Counties Society of Physiologists, 4.15

Views of

- Advertising Standards Authority, 6.15, 6.16
- British and European Osteopathic Association, 5.41–5.45
- British Medical Association, 6.3–6.5
- British Naturopathic and Osteopathic Association, 5.31–5.35
- The British Osteopathic Association, 5.36, 5.37
- College of Osteopaths, 5.41–5.45
- Faculty of Osteopathy, 5.40
- General Council and Register of Osteopaths, 5.2–5.8, 5.18, 5.21–5.23, 5.26
- Guild of Osteopaths, London, 5.44
- Independent Broadcasting Authority, 6.17
- The Institute for Complementary Medicine, 6.6
- The International Guild of Natural Medicine Practitioners, 5.44
- London and Counties Society of Physiologists, 5.39
- The Maidstone College of Osteopathy, 6.8, 6.9
- Natural Therapeutic and Osteopathic Society, 5.41–5.45
- The Osteopathic and Naturopathic Guild, 5.38
- Osteopathic Association of Great Britain, 5.27–5.30
- other schools, 6.10
- Society of Manipulative Osteopaths Ltd, 6.7
- ten professionally regulated osteopaths, 6.23

(References are to paragraph numbers, not page numbers)

